

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Montana State Office
5001 Southgate Drive, P.O. Box 36800
Billings, Montana 59107-6800
<http://www.mt.blm.gov/>

In Reply To:

1112 (930.KV) P

June 14, 2004

EMAIL TRANSMISSION – 6/15/04
Information Bulletin No. MT-2004-072

To: Field Manager, Lewistown Field Office

From: Deputy State Director, Division of Support Services

Subject: CASHE Findings Status Update

DD: 07/16/2004

Washington Office Instruction Memorandum No. 2004-185 (Attachment 1) was issued to all field officials on May 26, 2004. It requests the field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment – Safety, Health, and the Environment (CASHE) audits.

Attachments 2 and 3 reflect the findings that are not complete based on your last status update report to the contractor.

This request is for an update of the following information, where applicable: 1) the status of corrective action for each finding; 2) the point(s) of contact (full names of individuals, not a program, committee, office, or building owner); and 3) facility name changes.

It is imperative that you use the following descriptives to ensure that you are credited for correcting the CASHE deficiencies. Findings are not considered complete unless completion is explicitly stated by the respondent. Listed below are examples of acceptable terms to be used when you describe the status of your incomplete findings:

- unscheduled
- completed in (date if available)
- implemented in (date if available)
- scheduled for completion by (date)
- funding requested; anticipate completion by (scheduled date of completion)
- preliminary planning; anticipate completion by (scheduled date of completion)
- under design; anticipate completion by (scheduled date of completion)
- under construction; anticipate completion by (scheduled date of completion)
- N/A (e.g., if no longer relevant because a facility no longer exists).

(Note: If a finding is no longer relevant, please explain why.)

For those who respond electronically, do not rename or convert the files to a different software as file integrity is critical to the contractor's ability to track the data. If you prefer not to respond electronically, you should print the documents and update them by hand.

You are asked to send the completed table to Karilynn Volk, MT-930, as soon as possible, but no later than **Friday, July 16, 2004**. A consolidated response will be sent to the contractor by July 30, 2004.

Offices with incomplete CASHE findings are to continue to submit quarterly status update reports in accordance with Instruction Memorandum No. MT-2004-018.

If you have questions, please contact Karilynn Volk, at 406-896-5190, or Lisa Engelmann, at 406-896-5193.

Signed by: Sandra L. Guches

Authenticated by: Aleta Zahorodny (MT-930)

3 Attachments

- 1-WO IM 2004-185 (3 pp in its entirety)
- 2-Lewistown Field Office CASHE Findings (4 pp)
- 3-Lewistown Fire Office CASHE Findings (3 pp)

cc:

(MT-063), Tom Maxwell, CDSO
(MT-064), Jodi Camrud, Assistant FM, Havre Field Station
(MT-064), Laura Federspiel, CDSO
(MT-065), Kym Sigler, AO

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

May 26, 2004

In Reply Refer To:
1112, 1703 (360) P
Ref. IM No. 2003-167

EMS TRANSMISSION 06/04/2003
Instruction Memorandum No. 2004-185
Expires: 09/30/2005

To: All Field Officials

From: Assistant Director, Minerals, Realty, and Resource Protection

Subject: Facility Compliance Management and Tracking of CASHE Findings

DD: 07/31/2004

Program Areas: Facility Compliance and Safety.

Purpose: This Instruction Memorandum (IM) asks the Field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment - Safety, Health, and the Environment (CASHE) audits. This information will be used to identify projects for funding from infrastructure improvements money designated in Fiscal Year (FY) 2005 for CASHE corrective actions. In addition, the Bureau of Land Management (BLM) will make use of this data to:

- manage and minimize risk related to facility compliance, and
- identify future funding, policy, and training needs.

Accurate information about facility compliance is necessary for BLM to achieve its strategic planning goal to "Improve Public Safety and Security and Protect Public Resources from Damage."

Background: In FY 2003, 72 percent of BLM's organizational units were rated in good safety, health, and environmental condition. This performance was based on information received in response to Washington Office IM No. 2003-167, which asked the Field to update the status of unresolved CASHE findings. For the FY 2004 Annual Performance Report, organizational units will be considered in good condition if they have one or less incomplete corrective action related to a high priority CASHE finding. The good condition standard will be zero incomplete high priority findings in FY 2005 and subsequent Fiscal Years.

ATTACHMENT 1

The performance measurement data specification that defines high priority CASHE findings and describes how the data will be used is located at: <http://web.wo.blm.gov/ms1/>. The performance goal for FY 2004 is 74 percent of BLM organizational units be in good safety, health, and environmental condition.

Policy/Action: Updating Status of CASHE Recommendations/Corrective Actions:

Organizational units (i.e., Washington Office, State and Field Offices, National Centers) that have had a CASHE audit between October 1993 and February 27, 2004 are asked to update the status of recommendations/corrective actions. This data is to be reported on the spreadsheet that was transmitted separately to every Field Office safety officer and HAZMAT coordinator by their State Office Safety Manager or HAZMAT Program Lead. The spreadsheets and instructions for updating them will be transmitted to each State Office Safety Manager and HAZMAT Program Lead by May 17, 2004 via email. In addition, comments on the status of CASHE findings from draft CASHE reports for audits completed through June 24, 2004, will be incorporated into the status update database.

Implementation of CASHE Recommendations/Corrective Actions: Consistent with available budget resources and other programmatic concerns, organizational units are to implement CASHE recommendations/corrective actions and/or request funding for implementation within one year of the audit. Please note: the instructions for completion of the FY 2004 CASHE Status Update clarify that CASHE corrective actions having Hazard Abatement Plans in place that are prepared and approved in accordance with BLM Manual Handbook 1112-1, Safety and Health Management are considered complete provided funding for their implementation has been formally programmed for completion within two years.

Timeframe: Please return the updated spreadsheets by July 31, 2004. The due date for the status update is earlier than last year's because the Department is requiring that BLM provide its FY 2004 Annual Performance Report data earlier (i.e., first week of October 2004).

Please note: Organizational units that do not respond by July 31, 2004, will:

- have their corrective actions shown as incomplete,
- negatively affect the FY 2004 performance for the CASHE Performance Measure, and
- be ineligible for deferred maintenance funding for CASHE corrective actions.

Budget Impact: None.

Manual/Handbook Sections Affected: None.

Coordination: National Safety Office (WO-740).

Contacts: Ken Morin, Protection and Response Group (WO-360), 303-236-6418; Phyllis McKoy, Occupational Safety and Health (WO-740), 202-501-2788.

Signed by:
Bob Anderson
Acting Assistant Director
Minerals, Realty, and Resource Protection

Authenticated by:
Barbara J. Brown
Policy & Records Group, WO-560

Montana

Organizational Unit: Lewistown Field Office
Assessed Facility: Lewistown Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
ELEC-02-005	Electrical receptacles in damp locations at Havre Field Station and Lewistown Field Office facilities are not equipped with ground fault circuit interrupters (GFCIs).	07/18/2003	No	N/A	3	A) If the building is leased, request the building owner to replace faulty receptacles with GFCI receptacles or install GFCI circuits; or B) Contract with an electrician to replace faulty receptacles with GFCI receptacles or install GFCI circuits.	Harley Flemmer, Lori Federspiel	Scheduled for completion at Lewistown by September 30, 2003. Complete at Havre.	
HAZMAT-02-001	The ventilation system for the flammable storage room at Havre Field Station does not meet National Fire Code (NFC) requirements.	07/18/2003	No	N/A	3	A) Provide the building owner with a copy of this finding and request that the following actions be taken: 1) Remove the current ventilation system and seal the opening after removal; and 2) Install an explosion-proof ventilation system sized to vent the required air exchanges at floor level directly into the ally, through the exterior wall; B) Maintain a clear space in front of the floor-level fan to ensure that it can effectively exhaust air from the room; and C) Relocate all fuel to the wareshed and store other flammable liquids in the red storage cabinet in the flammable storage room.	Lori Federspiel	The building lease expires in April 2004. Building owner stated the flammable room only needs an exhaust fan. The new lease will require the building owner to replace the ventilation system if the lease is renewed.	
HWGEN-02-003	Lewistown Field Office personnel requested information on recycling computers that cannot be donated to local schools.	07/18/2003	No	Class IC	N/A	A) Research the web site for electronic equipment recyclers and determine if there is any interest in recycling computers from Lewistown Field Office facilities; and B) Continue to donate computers to schools and recycle excess computers with an electronics recycler.	Not provided. This finding was added to the final report after POCs were provided for draft report findings.	Not provided. This finding was added to the final report after status was provided on draft report findings.	

Montana

Organizational Unit: Lewistown Field Office
Assessed Facility: Lewistown Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
MGUARD-02-003	Belts, pulleys, and gear chains are exposed at Lewistown Field Office and at Havre Field Station.	07/18/2003	No	N/A	3	A) Replace the covers for the drill presses and the guard on the air compressor; or B) Fabricate expanded metal guards or cover that fully enclose the belts, pulleys, and chains; and C) If the scalper is not used, excess and dispose of the scalper.	John Fleharty, Lori Federspiel	Scheduled for completion by March 1, 2003. No scheduled completion date provided for Havre Field Station. Havre Field Station is awaiting the decision of whether or not to purchase new equipment.	
MGUARD-02-005	Angle grinders located in the warehouse cabinets at Havre Field Station and the Lewistown warehouse do not have proper guarding.	07/18/2003	No	N/A	3	Fabricate or purchase a guard that will provide the required protection between the operator and wheel during use.	John Fleharty, Lori Federspiel	Scheduled for completion by March 1, 2003. The angle grinders at Havre Field Station have been disposed.	
PW-02-004	The required repeat and additional routine sampling following a positive coliform result was not properly performed at Coal Bank Landing Recreation Area.	07/18/2003	Yes	Class IB	N/A	A) Perform repeat and additional routine sampling at Coal Bank in accordance with the guidance provided with this finding; B) Take coliform samples early in the month to ensure that repeat samples can be taken in the same month; C) Contact the State, county, or CASHE Program Lead (Ken Morin 303-236-6418) following a positive repeat sample for guidance on what actions should be taken; and D) Post public notifications of MCL violations and maintain a copy of them.	Harley Flemmer	Scheduled for implementation by September 30, 2003.	

Montana

Organizational Unit: Lewistown Field Office
Assessed Facility: Lewistown Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
PW-02-005	Sample locations are not identified on the water system sampling records for Coal Bank Landing Recreation Area or Kipp Recreation Area.	07/18/2003	No	Class IC	N/A	A) Give a unique identifier to all taps where water is provided to the public; and B) Use the identifiers in Coliform Sample Siting Plans, in sampling records, and on microbiological analysis forms to track the location of all water samples in accordance with the identification system.	Harley Flemmer	Scheduled for implementation by September 30, 2003.	
PW-02-006	Sampling guidance in the Coliform Sample Siting Plans for Little Rockies Fire Station and Kipp Recreation Area is not correct.	07/18/2003	Yes	Class IC	N/A	A) Prepare new Coliform Sample Siting Plans for Little Rockies Fire Station, Kipp, and Coal Bank that address all the elements discussed in this finding as well as the elements in the sample plan available from the CASHE Program Lead; and B) Formally submit the plans to MDEQ for their review and approval.	Harley Flemmer	Implemented at Little Rockies and Kipp. Scheduled for completion at Coal Banks by September 30, 2003.	
PW-02-007	Drinking water hauled to recreation sites where wells are out of service is not monitored to determine compliance with the maximum contaminant levels (MCL) for coliforms.	07/18/2003	No	Class IB	N/A	A) Use a solution with at least 50 mg/L of chlorine residual to disinfect the tank for 24 hours prior to use in the field; B) Collect a sample for coliform analysis each time the tank is filled and quarterly thereafter (if the tank remains in the field that long); C) If a sample comes back positive for total coliforms, either perform repeat and follow-up sampling or disinfect and refill the tank, as described above; D) Purchase a HACH hand-held spectrophotometer chlorine residual analyzer; and E) Monitor the chlorine residual periodically in the field and maintain a chlorine residual of at least 0.4 mg/L by adding small amounts of bleach as necessary.	Not provided. This finding was added to the final report after POCs were provided for draft report findings.	Not provided. This finding was added to the final report after status was provided on draft report findings.	

Montana

Organizational Unit: Lewistown Field Office
Assessed Facility: Lewistown Field Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
THS-02-001	The Hazard Communication (HAZCOM) Plans for the Lewistown Field Office and the Havre Field Station do not contain all required information.	07/18/2003	Yes	N/A	4	A) Modify the plans to include the required information; and B) Review the plans annually to ensure they stay current with Field Office and Field Station operations.	Tom Maxwell, Lori Federspiel	Scheduled for completion by January 31, 2004 at Lewistown. Complete at Havre.	
TSCA-02-001	Radon levels in the Fort Benton Welcome Center exceed EPA limits for an occupied area.	07/18/2003	Yes	Class IB	N/A	Perform radon mitigation for all buildings at Fort Benton.	Harley Flemmer	Scheduled for completion by January 31, 2004.	
WWS-02-003	The wooden trap door platform in the water system vault at Coal Bank Landing Recreation Area is unsecured, posing a fall hazard for anyone entering the vault.	07/18/2003	Yes	N/A	3	Install additional angle supports to stabilize the platform and prevent it from resting on the electrical conduit.	Harley Flemmer	Under design. Scheduled for completion by June 30, 2004.	

Montana

Organizational Unit: Lewistown Field Office
Assessed Facility: Lewistown Fire Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
HWMIN-02-001	Potentially excess and expired shelf-life hazardous materials are stored at the Lewistown Fire Dispatch Center.	07/18/2003	Yes	Class IB	N/A	A) Promptly return excess materials to the vendor for credit whenever possible (e.g., when planned projects are canceled); B) As a part of the winterization process, collect all hazardous materials from structures that are not temperature-controlled and consolidate them in a temperature-controlled storage area; and C) Turn excess or unusable hazardous materials in to the Central Zone HAZMAT Coordinator for reuse or proper disposal. [Note: The HAZMAT Coordinator will determine whether the materials can be used by another facility, and if not, will arrange for their disposal.]	Jay McAllister	Scheduled for completion by September 1, 2003.	
MHS-02-001	Plastic containers of fire retardant stored outside at the Little Rockies Fire Station and the Lewistown Fire Dispatch Center are being degraded by sunlight causing the containers to become brittle.	07/18/2003	No	N/A	4	A) Store the retardant in an existing covered structure; or B) Construct a covered structure to store the retardant so it is not exposed to the elements; and C) Ensure all containers are properly labeled.	Jay McAllister, Kyle Cowen	Funding requested. Scheduled for completion by January 31, 2004.	

Montana

Organizational Unit: Lewistown Field Office
Assessed Facility: Lewistown Fire Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
PW-02-004	The operation and maintenance practices for water treatment systems at Little Rockies Fire Station are not adequate to ensure they produce potable water.	07/18/2003	No	Class IB	N/A	A) Check the filters in each Kinetico Drinking Water Plus, GX Model to determine if the “MACguard Filter” element is installed and replace the filter elements as necessary; B) Identify a treatment system point-of-contact (POC) who is responsible for operation and maintenance of the systems and filter cartridges; C) Contract for preparation of an operations and maintenance manual for the treatment systems and conduction of a course on its operation; D) Develop and implement monitoring and maintenance programs for the treatment systems to ensure that they are removing the contaminants of concern and that chemicals and components (e.g., filters) are replenished/replaced as necessary; E) Prepare a new Coliform Sampling Siting Plan for the Little Rockies Fire Station [Note: The Coliform Sample Siting Plan for the fire station is inadequate and provides incorrect sampling directions. A Potable Water finding in the Lewistown Field Office section provides additional details on the inadequacies of the plans written for two recreation sites and the fire station.]; and F) Maintain a stock spare chemicals and replacement components for the system.	Kyle Cowen	Scheduled for completion by January 31, 2004.	

Montana

Organizational Unit: Lewistown Field Office
Assessed Facility: Lewistown Fire Office

Finding Number	Finding	Date of Final Report	Repeat ?	Priority Level	Safety RAC	Recommendation	Point(s) of Contact	Last Reported Status	Current Status
SARA-02-001	The Lewistown Fire Dispatch Center has not informed the State Emergency Response Commission (SERC) that they are storing retardant above the hazardous chemical reporting threshold in EPA's Emergency Planning and Community Right-to-Know regulations.	07/18/2003	No	Class IC	N/A	A) Contact the SERC and submit MSDSs and a Tier I form for Phos-Chek D75; and B) Submit the Tier I form annually.	Jay McAllister	Scheduled for completion by July 31, 2003.	
SW-02-001	Abandoned fuel tanks are stored in the wareyard at the fire dispatch center.	07/18/2003	No	Class IB	N/A	Inert the tanks and dispose of them as scrap metal.	Jay McAllister	Scheduled for completion by July 31, 2003.	
WWS-02-002	Load limits indicate the lofts are not adequate for the material being stored.	07/18/2003	No	N/A	4	A) Determine the maximum point load limit for both lofts; and B) If the maximum point load limits are not sufficient for usage in either loft, relocate the weight room and/or tailgate training area to new locations.	Carl Patten	Scheduled for completion by January 31, 2004.	